

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

IN RE:)	
)	
7 BAY CORP)	Chapter 11
)	Case No. 15-14885-FJB
Debtor)	
)	

LIMITED OBJECTION OF AVIDIA BANK TO THE EXPEDITED MOTION OF UB PROPERTIES, LLC FOR RELIEF FROM STAY

Avidia Bank ("Avidia" or the "Bank") by and through its counsel, states its Limited Objection to UB Properties, LLC's ("UB") Expedited Motion for Relief from Stay, as follows:

1. The Debtor in its Objection to UB's Motion for Relief from Stay has raised issues of valuation of the 7 Bay Project and the accounting by UB of the amount owed, both of which must be determined by the Court;
 2. The Debtor's Motion for Authorization to incur Post-Petition Debt through DIP Financing raises the prospect of a filing of a Plan of Reorganization by the Debtor through which the Debtor proposes to pay creditors in full, including secured creditors of which Avidia is junior to UB Properties, LLC and National Lumber. Such a Plan of Reorganization would be a benefit to the Estate.
- WHEREFORE, Avidia Bank respectfully asks this Court to deny UB Properties LLC's Expedited Motion for Relief from Stay.

AVIDIA BANK
By its Attorney,

/s/ Howard B. D'Amico
Howard B. D'Amico (BBO553420)
Howard B. D'Amico, P.C.
33 Waldo Street
Worcester, MA 01608
(508) 793-1606
hdamico@hbdpc.com

CERTIFICATE OF SERVICE

I, Howard B. D'Amico, Esq., do hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 29, 2016 by prepaid First Class Mail.

/s/ Howard B. D'Amico
Howard B. D'Amico